

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMBERLY S. WOMACK,

Plaintiff,

v.

Case No. 5:19-cv-00683-R

MERCY HOSPITAL OKLAHOMA
CITY, INC., et al.,

Defendants.

**DEFENDANT'S PARTIALLY UNOPPOSED MOTION
FOR AN EXTENSION OF TIME TO FILE AN ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendant Mercy Hospital Oklahoma City, Inc. (the “Defendant”), pursuant to LCvR 7.1(h), respectfully moves the Court for a two-week extension of time to file its answer or otherwise respond to Plaintiff’s First Amended Complaint (“First Amended Complaint”), [Doc. No. 19], filed on March 13, 2020. In support of the requested extension, Defendant shows the Court as follows:

1. Currently, Defendant’s response to the First Amended Complaint is due March 27, 2020.
2. One previous motion for extension was made and granted by the Court.
3. Due to the nature of the claims in Plaintiff’s First Amended Complaint, the fact that it is an entirely different draft in multiple respects from Plaintiff’s Complaint, and it includes a 25-page timeline of events, Defendant is seeking a two-week extension of time to file its response to the First Amended Complaint to allow adequate time to evaluate the new allegations.

4. Plaintiff has been contacted and does not object to the requested extension to file an answer but does object to the requested extension to file any other response.

5. The current response date will be the only deadline affected in the case because no scheduling order is in place.

6. Defendant respectfully moves the Court for an extension of time to file its answer or otherwise respond to the First Amended Complaint by two weeks or until April 10, 2020.

/s/ Justin P. Grose

Samuel R. Fulkerson, OBA #14370

Justin P. Grose, OBA #31073

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

sam.fulkerson@ogletree.com

justin.grose@ogletree.com

621 N. Robinson Ave., Ste. 400

Oklahoma City, OK 73102

Telephone: (405) 546-3758

Facsimile: (405)546-3775

Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that on March 26, 2020, a true and correct copy of the foregoing was forwarded by U.S. First-Class Mail and email upon the following:

Kimberly S. Womack
12905 Elrond Drive
Oklahoma City, OK 73170
womack-5@outlook.com
Pro Se Plaintiff

/s/ Justin P. Grose

Justin P. Grose